

Monte J. White and Associates
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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
ABILENE DIVISION

IN RE: §
Eduardo Montenegro Flores § Case No. 13-10111-RLJ-13
§
DEBTOR §

DEBTOR'S RESPONSE TO MOTION FOR RELIEF FROM
AUTOMATIC STAY OF First Financial Bank, N.A.

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now Debtor in the above-titled cause and files this Response to Motion for Relief from Automatic Stay.

On August 23, 2013, Attorney for First Financial Bank, N.A., Mark S. Zachary, filed a Motion for Relief from Automatic Stay, in response thereto, Debtor would show the following:

1. ADMIT
2. ADMIT
3. ADMIT
4. ADMIT
5. DENY
6. DENY
7. DENY
8. DENY
9. DENY
10. DENY
11. DENY

WHEREFORE, PREMISES CONSIDERED, Debtor prays that motion be denied in all respects, that the Court award reasonable and necessary attorney fees for the defense of this Motion and for such other and further relief to which he may be entitled.

Respectfully submitted,

/s/Monte J. White

Attorney for Debtor

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Response to Motions for Relief from Stay was served by ECF and/or mailed on August 28, 2013, to the following as indicated:

/s/Monte J. White
Attorney for Debtor

Movant:	First Financial Bank, N.A. 400 Pine St Abilene, TX 79601
Attorney for Movant:	Mark S. Zachary McMahon Surovik Suttle P.O. box 3679 Abilene, TX 79604
Trustee:	Chapter 13 Trustee Walter O'Cheskey 6308 Iola Ave. Lubbock, TX 79424 U.S. Trustee William T. Neary 1100 Commerce Street, Room 9-C-60 Dallas, TX 75242
Debtor:	Eduardo Montenegro Flores 1333 Palm St. Abilene, TX 79602